

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both )  
individually and as Legal Guardian of )  
SHANE ALLEN LOVELAND, et al., )  
Plaintiffs, )  
v. ) Case No. 8:18-cv-00127  
THE GOODYEAR TIRE & RUBBER )  
COMPANY, )  
Defendant. )

**CONSENT MOTION FOR EXTENSION OF TIME**

The Goodyear Tire & Rubber Company (“Goodyear”) respectfully moves for extension of its deadline to respond to Plaintiffs’ Motion to Apply Ohio Law Regarding Punitive Damages (ECF No. 106). In support of this Motion, Goodyear states as follows:

1. Plaintiffs filed their Motion to Apply Ohio Law Regarding Punitive Damages on August 12, 2019. Pursuant to Rule 7.1(b)(1)(B) of the Nebraska Civil Rules, Goodyear’s brief opposing this Motion is currently due on or before August 26, 2019.
2. Given the complicated choice-of-law issues presented by this Motion, Goodyear respectfully requests that its deadline to respond to this Motion be extended until September 3, 2019.
3. Federal Rule of Civil Procedure 6(b)(1) gives this Court the discretion to, for good cause shown, extend the time to respond to Motions.
4. Goodyear respectfully submits that it has demonstrated the requisite good cause under Rule 6(b) to support the extension it is seeking.
5. Goodyear seeks this extension in good faith, and for no improper purpose.

6. Goodyear has conferred with counsel for Plaintiffs and counsel has no objection to the granting of this Motion.

**WHEREFORE**, The Goodyear Tire & Rubber Company respectfully requests that the Court extend its deadline to oppose Plaintiffs' Motion to Apply Ohio Law Regarding Punitive Damages to September 3, 2019, and grant such other and further relief as the Court deems just and appropriate under the circumstances.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed with the Clerk of the Court and served upon all attorneys of record using the CM/ECF system this 23rd day of August, 2019.

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